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ALABAMA REAL ESTATE COMMISSION
EMPOWER, CONNECT, AND EDUCATE

1201 Carmichael Way / Montgomery, Alabama 36106
Phone: 334-242-5544 / Email: arec@arec.alabama.gov
Website: arec.alabama.gov

Complaint Form

This form may be used to file a complaint against individuals or companies who may have violated the Alabama Real Estate License Law [Chapter 27 of Title 34 of the *Code of Alabama, 1975*, as amended] or the Rules and Regulations of the Alabama Real Estate Commission. The Commission's Legal Division will review the completed form to determine whether it falls within the Commission's jurisdiction.

Complete the form and return it to the Commission by **mail to 1201 Carmichael Way, Montgomery, AL 36106, or email it to arec@arec.alabama.gov**. Please complete the form accurately and include any supporting documents.

The Commission has the authority to take disciplinary actions against a licensee, including any one or combination of the following: imposition of education, fines, license suspension, or license revocation.

The Commission **does not** have the authority to enforce or rescind contractual agreements, adjudicate civil matters, collect monies, recover losses, award damages, or determine civil liabilities or culpability. The Commission does not investigate landlord/tenant disputes, construction defects, ethics violations, homeowners' association violations, loans, interest rates, title problems, or insurance issues.

Complainant's Name Christle D. Moreno / C.C. Dixon-Moreno and Brent Moreno

Mailing Address 5267 Old Hwy 11, Suite B

City Hattiesburg State MS Zip 39402

Contact Phone 601-203-0911

Email Address cc@morenolawms.com Real Estate License # (if licensed) N/A

❑ I request to remain anonymous

NOTE: *If you are making an anonymous complaint and you are not willing to be a witness or assist in the investigation, then the Commission is severely limited. It is possible, even if there is a violation that should be addressed by the Commission and/or potentially result in a sanction, that our investigators may not be able to gather sufficient independent information to establish a case with enough probable cause to proceed to a hearing.* ***NOTE: "anonymous" identity may be discoverable through an open records request.***

General Information

The incidents upon which this Affidavit is based occurred in the county or counties of Baldwin County

The full names of those whom I believe may have acted in violation of the Alabama Real Estate License Law, Rule, or Regulation are:

Name and License Number (if known)	Employed by
Donna Davis (license # unknown)	Keller Williams Alabama office / broker to confirm
AL qualifying broker / broker of record for Donna Davis	Keller Williams Alabama office to be confirmed
Keller Williams Alabama brokerage office involved in Unit 103	License entity / supervising broker to be confirmed
Gary Davis - non-licensee witness / spouse / COA board	Bayshore Towers COA board member
Any other supervising broker responsible for Donna Davis	Keller Williams / AREC to identify

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Description of Incident(s) Upon Which This Complaint is Based

Attach additional pages, if necessary.

In the space provided below, briefly describe the acts or omissions that you believe violate the Alabama Real Estate License Law or Commission Rules and Regulations, and the circumstances surrounding the acts and omissions.

If you refer to any documents or other supportive evidence in your description, we request that you attach a copy of any such evidence, if possible. Some examples of documents include contract forms, listing agreements, estimated net sheets, or any other documents that you believe would help us understand your problem.

See attached Detailed Sworn Complaint and redacted exhibits. Donna Davis, the Realtor who listed/showed or otherwise handled Bayshore Towers Unit 103, received our proof-of-income, ID, business account, personal account, and financial records on 11/21/2024 for rental-screening only. Her associated Keller Williams Alabama office reportedly does not perform property management, raising broker-supervision, authorization, retention, Gmail-use, and confidentiality issues. Donna Davis is married to Gary Davis, a Bayshore Towers COA board member. The COA later became adverse to us over lease, pet, fines, access, communication, and removal issues. This occurred in the broader Orange Beach/Tony Kennon public-records/body-camera dispute and pressure/removal context. AREC is not asked to investigate Mayor Kennon, the City, HOA issues, or landlord/tenant issues; that context is included only because it bears on motive, timing, conflict, access, and disclosure risk. Superhuman records show Donna Davis's email account later reopened the financial-document email; the screen shows 11 opens. I request AREC investigate Donna Davis and her Alabama qualifying broker/brokerage, including the Gary Davis/COA conflict, document retention, access/download/forward/print history, and whether information was shared or used beyond the rental-screening purpose. Redacted exhibits attached; unredacted records available upon secure request.

COMPLAINT TO THE ALABAMA REAL ESTATE COMMISSION

Donna Davis / Gary Davis / Bayshore Towers Unit 103 / Redacted Exhibit Packet

This ready-to-file packet is intended to be submitted as the complaint statement and redacted exhibit packet. The complainants are not attaching unredacted bank statements, IDs, proof-of-income records, account information, or other sensitive financial records at this time. Those records will be provided upon AREC request and only through a secure or confidential submission process.

The complaint should include Donna Davis, the Alabama qualifying broker/broker of record responsible for Donna Davis, the Keller Williams Alabama brokerage office involved in the listing/showing/rental-screening process, and any supervising broker responsible for office policy, document retention, confidentiality, and authorization for rental or property-management activity.

I. Complaint / Intake Information

Complainants	Christle D. Moreno / C.C. Dixon-Moreno and Brent Moreno
Complainant Email	cc@morenolawms.com
Subject Property	Bayshore Towers, Unit 103, Orange Beach, Alabama
Primary Respondent	Donna Davis, real estate licensee/Realtor; license number and current status to be confirmed by AREC.
Additional Respondent / Involved Broker	Donna Davis's Alabama qualifying broker, broker of record, supervising broker, and Keller Williams Alabama brokerage office responsible for the listing/showing/rental-screening file; name, license number, and office to be confirmed by AREC.
Material Non-Licensee Witness / Conflict Issue	Gary Davis, Donna Davis's husband and a Bayshore Towers COA board member. He is material to disclosure, conflict, access, communication, and potential use of information issues.
Other Material Witnesses / Context	Angie Boothe Lueckemeyer and Layne Lueckemeyer, Bayshore Towers residents and defendants in a defamation case filed by Christle D. Moreno, who allegedly emailed the Bayshore Towers board about options for the Morenos' removal.
Filing Posture	Redacted exhibits included. Unredacted financial records, IDs, bank statements, and account records available upon AREC request under secure/confidential handling.

II. Short Complaint Statement for AREC Form

Donna Davis was the Realtor who listed, marketed, showed, or otherwise handled Bayshore Towers Unit 103 in Orange Beach, Alabama. She showed the condo to my husband, Brent Moreno, and me. As part of the rental-screening process, on November 21, 2024, I sent Ms. Davis an email titled "Proof of Income and ID" containing private financial information, proof of income, business account information, personal account information, and identification materials.

The documents were provided for the limited purpose of rental qualification only. They were sent to Donna Davis at a Gmail address, not through a secured property-management portal or an official brokerage document system. I later learned that Donna Davis is married to Gary Davis, a Bayshore Towers COA board member. That relationship is material because the COA later became adverse to us over lease enforcement, pet issues, fines, access credentials, direct communication, and removal-related issues.

I also understand that the Keller Williams Alabama office associated with Donna Davis does not perform property management. If that is correct, AREC should investigate why a Keller Williams

licensee and her broker/brokerage were receiving, retaining, storing, and later accessing tenant-screening financial documents if the office was acting only as a listing/showing brokerage and not as property manager.

Superhuman read-receipt evidence shows Donna Davis's email account reopened the November 21, 2024 "Proof of Income and ID" email after the rental-screening period. The screen shows 11 total opens, including later access entries. I can prove the email account reopened the email. I cannot yet prove who physically clicked it, who viewed the attachments, whether the attachments were downloaded or forwarded, or whether the information was shared with Gary Davis, any other COA board member, property management, Angie Boothe Lueckemeyer, Layne Lueckemeyer, or any other third party.

The broker must be included because broker supervision, brokerage authorization, use of a personal Gmail account, document-retention policies, confidentiality safeguards, and the scope of any rental or property-management role are directly at issue. This complaint asks AREC to investigate Donna Davis, her Alabama qualifying broker/broker of record, the responsible Keller Williams Alabama brokerage office, and the handling, retention, access, and possible misuse of the Morenos' private documents.

This complaint also arises in the broader Orange Beach context involving Mayor Tony Kennon and the City of Orange Beach public-records/body-camera dispute. The complainants are not asking AREC to investigate Mayor Kennon, the City, the body-camera matter, or Orange Beach politics. That context is included because the later access to private tenant-screening financial documents occurred while the Morenos were involved in a broader public accountability dispute and while multiple Orange Beach-connected actors were attempting to discredit, pressure, or remove them from Orange Beach. The AREC issue remains narrower: whether the licensee and supervising broker properly obtained, stored, protected, accessed, disclosed, or used private applicant documents in that broader adverse context.

III. Detailed Sworn Complaint Statement

A. Donna Davis's Role in the Rental Transaction

Donna Davis listed, marketed, showed, or otherwise handled the rental showing for Bayshore Towers Unit 103. She showed the unit to Christle D. Moreno / C.C. Dixon-Moreno and Brent Moreno. In that role, she received or requested tenant-screening documents from the Morenos.

B. Private Financial Documents Provided for a Limited Purpose

On November 21, 2024, C.C. Moreno sent Donna Davis an email titled "Proof of Income and ID." The body of the email stated: "I'm including my business accounts and our personal accounts. I'm missing one, but will forward when my banker has it ready." The attachments included proof-of-income and identification-related documents. Those unredacted attachments are not included in this filing.

The documents were sent for a limited rental-screening purpose only. The complainants did not consent to the documents being used for COA enforcement, removal efforts, retaliation, informal building politics, resident disputes, defamation activity, or any purpose unrelated to rental qualification.

C. Broker / Keller Williams Alabama Supervision Issue

AREC should bring in Donna Davis's Alabama qualifying broker, broker of record, supervising broker, and responsible Keller Williams Alabama office. The broker/brokerage should be required to explain what capacity Donna Davis was acting in when she received sensitive tenant-screening materials,

whether the brokerage authorized use of a Gmail account for bank records and IDs, what file retention system was used, and what confidentiality safeguards applied.

This issue is heightened because the complainants understand that the Keller Williams office associated with Donna Davis does not perform property management. If the office does not perform property management, AREC should determine why the licensee and brokerage were involved in collecting, storing, retaining, and later accessing private applicant financial materials rather than directing the applicants to a property-management entity, secure application portal, or other authorized process.

D. Gary Davis / COA Board Conflict

Donna Davis is married to Gary Davis, a Bayshore Towers COA board member. That relationship is material to the complaint. It ties Donna Davis's household to the board governing the building where the Morenos lived and to the board later involved in disputes about the Morenos' lease, pet, fines, access credentials, communications, and removal-related issues.

AREC should determine whether Donna Davis disclosed that conflict to the Morenos before obtaining private financial and identification records. AREC should also determine whether Gary Davis had access to her email, devices, printed files, brokerage file, applicant file, attachments, downloads, or communications concerning Unit 103, the Morenos, or their private documents.

E. Broader Orange Beach / Tony Kennon Context

After the rental-screening process, Bayshore Towers and its COA became adverse to the Morenos over lease enforcement, pet issues, fines, direct communication, access credentials, and removal-related issues. Angie Boothe Lueckemeyer and Layne Lueckemeyer live in the same building and are defendants in Christle D. Moreno's defamation case. They emailed the Bayshore Towers board about options for the Morenos' removal. This did not occur in a vacuum. It occurred within a broader Orange Beach conflict involving Mayor Tony Kennon and the City of Orange Beach public-records/body-camera dispute, and within a broader pattern in which Orange Beach-connected individuals were attempting to discredit, pressure, isolate, or remove the Morenos from Orange Beach after Christle D. Moreno began seeking public accountability.

The complainants are not asking AREC to adjudicate the Tony Kennon matter, the City of Orange Beach public-records/body-camera dispute, the Bayshore COA dispute, the defamation case, or any landlord/tenant or HOA issue. The Tony Kennon/Orange Beach context is included only because it bears on motive, timing, conflicts, access, disclosure risk, and the need for AREC to determine whether a licensee, her husband/COA-board-member household, and her supervising broker/brokerage properly protected private tenant-screening financial documents during a period of broader adverse action against the Morenos.

F. Later Access / Read Receipts

The Superhuman read-receipt screen for the November 21, 2024 email shows the email was opened 11 total times. The visible entries include later openings associated with the recipient account. The read receipts support an investigation into later access, retention, download, forwarding, printing, disclosure, and purpose of access.

G. Current Proof and Limits of Current Proof

At present, the complainants can prove that Donna Davis's email account reopened the email containing private financial information and IDs. The complainants cannot yet prove who physically clicked the

email, who viewed attachments, whether attachments were downloaded or forwarded, whether the broker knew, or whether the information reached Gary Davis, the COA board, property management, Angie Boothe Lueckemeyer, Layne Lueckemeyer, or any other third party. Those are investigation questions for AREC.

IV. Issues for AREC to Investigate

1. Donna Davis's license number, current license status, brokerage affiliation, Alabama qualifying broker, broker of record, supervising broker, and responsible Keller Williams Alabama office.
2. The exact capacity in which Donna Davis acted: listing agent, showing agent, rental agent, tenant-screening agent, property manager, or other role.
3. Whether Donna Davis, the Alabama qualifying broker, or the Keller Williams Alabama brokerage had authority to receive tenant-screening financial records if the office does not perform property management.
4. Whether Donna Davis disclosed that Gary Davis was a Bayshore Towers COA board member before obtaining the Morenos' IDs, proof of income, business account information, personal account information, and other financial records.
5. Whether the Alabama broker knew or should have known of the spouse/COA conflict and whether the broker approved Donna Davis receiving or retaining the documents in that context.
6. Whether Donna Davis used a personal Gmail account to receive sensitive applicant documents with the knowledge or approval of her broker/brokerage.
7. What policies governed receipt, storage, retention, access, download, printing, forwarding, disclosure, and destruction of applicant bank statements, IDs, proof of income, and account materials.
8. Why the November 21, 2024 email and attachments were opened or accessed after the rental-screening period.
9. Whether any person other than Donna Davis accessed the email account, devices, attachments, downloads, printed documents, or brokerage file.
10. Whether the documents or information were disclosed, discussed, or used in connection with the Bayshore Towers COA, property management, access credentials, fines, pet issues, removal, defamation, retaliation, or pressure on the Morenos.
11. Whether any private financial information, identity documents, applicant-screening materials, or information derived from those records were accessed, discussed, or used in connection with the broader Orange Beach/Tony Kennon public-records/body-camera dispute, any effort to discredit the Morenos, or any effort to pressure or remove them from Orange Beach.
12. Whether any license law, AREC rule, broker-supervision duty, confidentiality duty, honesty/trustworthiness duty, property-management rule, record-retention duty, or consumer-protection obligation was violated.

V. Preservation Request

Complainants request that AREC direct Donna Davis, her Alabama qualifying broker/broker of record, the supervising broker, the responsible Keller Williams Alabama office, Bayshore Towers, the COA, and relevant management or board participants to preserve:

- All emails, attachments, message headers, read receipts, metadata, downloads, forwards, print logs, access logs, and device records concerning the November 21, 2024 "Proof of Income and ID" email.
- All communications between Donna Davis and Gary Davis concerning the Morenos, Unit 103, Bayshore Towers, the lease, rental application, proof of income, IDs, bank/account materials, pet issues, fines, access credentials, removal, or COA issues.
- All communications between Donna Davis, her broker, her brokerage, any COA board member, Jay McKinney, Wallace Heck, Angie Boothe Lueckemeyer, Layne Lueckemeyer, or any Bayshore resident concerning the Morenos or Unit 103.
- All communications, if any, between Donna Davis, Gary Davis, her broker/brokerage, any Bayshore Towers COA participant, and Mayor Tony Kennon, the City of Orange Beach, City employees, City officials, or City-connected persons concerning the Morenos, Unit 103, Bayshore Towers, removal, public accountability activity, the public-records/body-camera dispute, or any effort to discredit or pressure the Morenos.
- All brokerage files, applicant files, tenant-screening records, transaction records, document-retention logs, privacy policies, confidentiality policies, Gmail/account-use policies, and property-management authority records.
- All records identifying the Alabama qualifying broker, broker of record, supervising broker, office policy, and scope of authority for Donna Davis in connection with Unit 103.

VI. Requested Relief / Action

1. Open a formal AREC investigation into Donna Davis and the Alabama broker/brokerage responsible for supervising her conduct in connection with Unit 103.
2. Identify and include Donna Davis's Alabama qualifying broker, broker of record, supervising broker, and Keller Williams Alabama office in the investigation.
3. Require preservation and production of all relevant emails, attachments, metadata, access logs, download/forward/print history, brokerage files, applicant-screening files, and communications.
4. Determine whether the documents were viewed, downloaded, printed, forwarded, disclosed, discussed, or used outside the original rental-screening purpose.
5. Determine whether Donna Davis disclosed the conflict involving Gary Davis's COA board position and whether the broker knew or should have known of the conflict.
6. Determine whether later access to the November 21, 2024 documents was connected in any way to the broader Orange Beach/Tony Kennon dispute, including efforts by Orange Beach-connected persons to pressure, discredit, isolate, or remove the Morenos.
7. Determine whether Donna Davis was engaging in rental/property-management activity outside the authority or scope of her brokerage, especially if the Keller Williams Alabama office does not perform property management.
8. Provide written instructions for securely submitting unredacted bank statements, IDs, proof-of-income documents, and additional exhibits under confidential treatment.
9. Provide a complaint number, assigned investigator, and written confirmation of next steps.

VII. Included Redacted Exhibits

The following redacted exhibits are included. The underlying unredacted financial records and IDs are not included and will be provided only upon request through secure/confidential submission instructions.

- Exhibit A - Redacted email metadata and attachment list for the November 21, 2024 "Proof of Income and ID" email.
- Exhibit B - Redacted Superhuman read-receipt screenshot showing 11 total opens.
- Exhibit C - Redacted scope/conflict summary tying Donna Davis, the Alabama broker/brokerage, Keller Williams, Unit 103, and the property-management authority issue.
- Exhibit D - Redacted removal-context summary tying Gary Davis, the Bayshore Towers COA board, Angie Boothe Lueckemeyer, Layne Lueckemeyer, and the board-removal issue.
- Exhibit E - Redacted broader Orange Beach / Tony Kennon context summary. This is included as context only and is not a request for AREC to adjudicate the City of Orange Beach, Mayor Kennon, the public-records/body-camera dispute, or any HOA/landlord-tenant issue.

VIII. Verification

We certify that the facts stated in this complaint are true and correct to the best of our knowledge, information, and belief. We reserve the right to supplement this complaint as additional documents are located or as AREC requests additional information.

Date: June 29, 2026

Christle D. Moreno / C.C. Dixon-Moreno, Complainant

Date: June 29, 2026

Brent Moreno, Complainant

IX. Notarial Acknowledgment

STATE OF Mississippi

COUNTY OF Lamar

Sworn to and subscribed before me on this 29th day of June, 2026, by Christle D. Moreno / C.C. Dixon-Moreno and Brent Moreno.

Notary Public

My Commission Expires: 7-10-2028

REDACTED EXHIBIT A

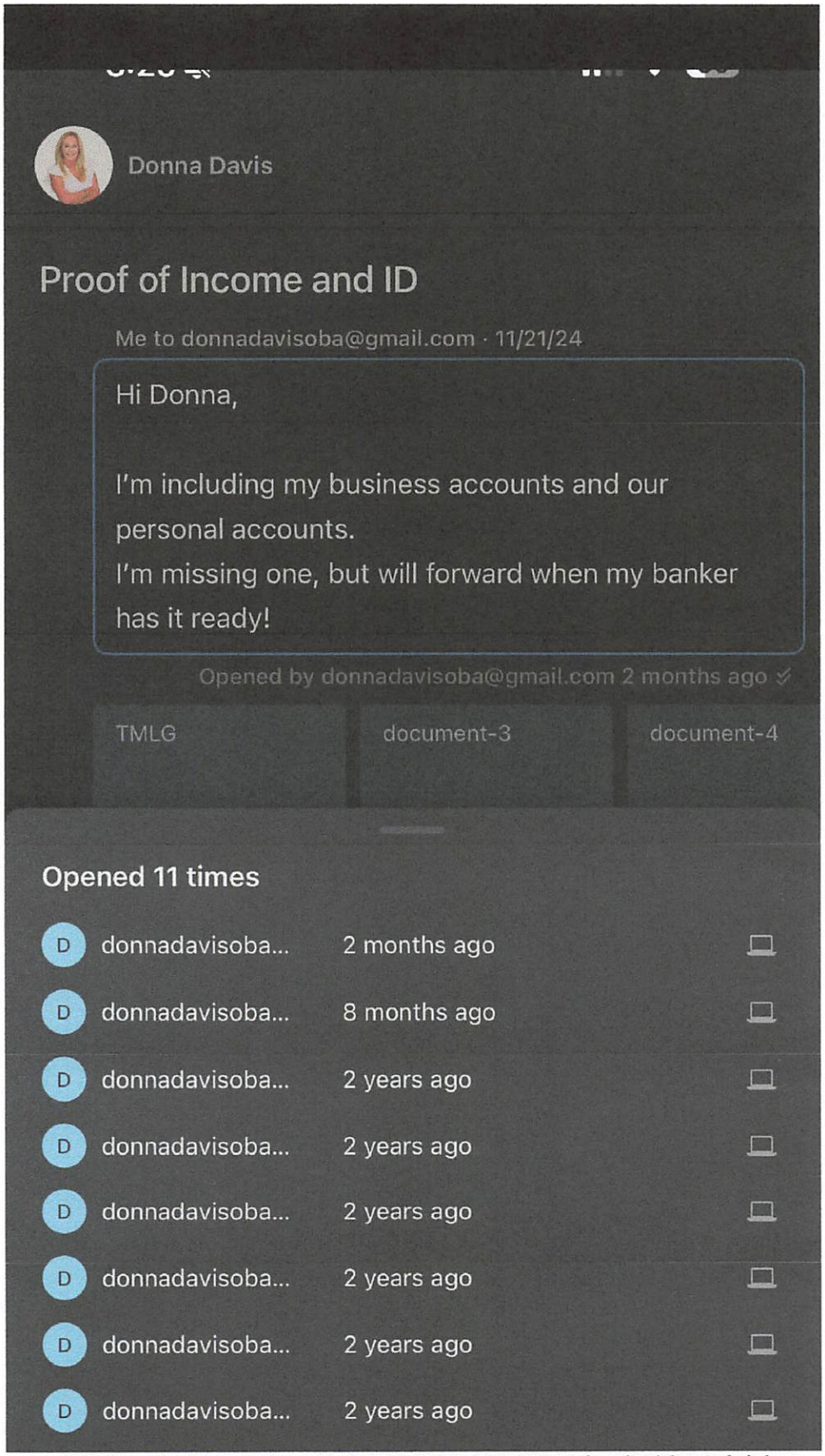
Email Metadata and Attachment List - Financial Attachments Withheld

Date Sent	November 21, 2024
From	C.C. Moreno / cc@morenolawms.com
To	Donna Davis / donnadavisoba@gmail.com
Subject	Proof of Income and ID
Email Body	"Hi Donna, I'm including my business accounts and our personal accounts. I'm missing one, but will forward when my banker has it ready!"
Attachments Visible in Email Record	TMLG.pdf; document-3.pdf; document-4.pdf; document-5.pdf; document-6.pdf; IMG_5068.jpeg
Redaction / Withholding	The actual attachment contents are not included. They contain IDs, proof of income, business account information, personal account information, and/or financial records. Unredacted records available upon AREC request through secure/confidential submission instructions.
Reason Exhibit Matters	Shows Donna Davis received sensitive tenant-screening records for the Unit 103 rental process and that the materials were sent for a limited purpose.

REDACTED EXHIBIT B

Superhuman Read-Receipt Screenshot - Status Bar Redacted

This screenshot shows the November 21, 2024 email titled "Proof of Income and ID" and the Superhuman read-receipt panel reflecting 11 total opens. The underlying financial attachments are not included.


Donna Davis
Proof of Income and ID
Me to donnadavisoba@gmail.com · 11/21/24
Hi Donna,
I'm including my business accounts and our personal accounts.
I'm missing one, but will forward when my banker has it ready!
Opened by donnadavisoba@gmail.com 2 months ago
TMLG
document-3
document-4
Opened 11 times
D donnadavisoba... 2 months ago
D donnadavisoba... 8 months ago
D donnadavisoba... 2 years ago
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REDACTED EXHIBIT C

Brokerage Scope / Property-Management Authority Issue

Donna Davis Role	Listed, marketed, showed, or otherwise handled Unit 103 and received tenant-screening materials.
Broker/Brokerage Issue	AREC should include the Alabama qualifying broker, broker of record, supervising broker, and Keller Williams Alabama office responsible for Donna Davis.
Property Management Issue	Complainants understand Donna Davis's Keller Williams office does not perform property management. If true, AREC should investigate what authority existed for collecting and retaining tenant financial records and IDs.
Gmail Issue	Sensitive documents were sent to and retained in a Gmail account associated with Donna Davis rather than a secure property-management portal or official brokerage document system.
Requested Broker Inquiry	Determine whether the broker authorized the rental-screening process, Gmail use, receipt and retention of IDs/bank records, and whether broker policies were followed.

REDACTED EXHIBIT D

Conflict / Removal Context Summary

Spouse / COA Conflict	Donna Davis is married to Gary Davis, a Bayshore Towers COA board member. AREC should confirm Gary Davis's identity and board role and determine whether the conflict was disclosed.
Removal Context	Angie Boothe Lueckemeyer and Layne Lueckemeyer live in the same building, are defendants in Christle D. Moreno's defamation case, and allegedly emailed the Bayshore Towers board about options for the Morenos' removal.
COA Adversity	Bayshore Towers and/or COA-related actors later became adverse to the Morenos regarding lease enforcement, pet issues, fines, communications, access credentials, and removal-related issues.
Why This Matters	Later access to private financial documents is material because the licensee's household is connected to the board, and people in the building were discussing removal while private applicant documents remained accessible.
Redaction / Withholding	Underlying removal emails, pleadings, board communications, and additional screenshots can be produced upon AREC request. Sensitive or litigation-related materials should be handled confidentially as appropriate.

REDACTED EXHIBIT E

Broader Orange Beach / Tony Kennon Context Summary

Context Only	This exhibit is included to explain motive, timing, relationship, and disclosure-risk context. It is not a request for AREC to adjudicate the City of Orange Beach, Mayor Tony Kennon, the public-records/body-camera dispute, or any HOA/landlord-tenant matter.
Broader Issue	Christle D. Moreno has been involved in a broader Orange Beach public-accountability dispute involving Mayor Tony Kennon and the City of Orange Beach public-records/body-camera matter. The Morenos contend that Orange Beach-connected persons have attempted to discredit, pressure, isolate, or remove them from Orange Beach.
Why Relevant to AREC	The broader Tony Kennon/Orange Beach context matters because private tenant-screening documents were later accessed from Donna Davis's email account after the rental-screening purpose ended, while the licensee's husband, Gary Davis, sat on the Bayshore Towers COA board and while building residents/COA-related actors were discussing removal.
AREC Issue Remains Narrow	The regulatory issue is whether Donna Davis and her supervising broker/brokerage properly obtained, stored, retained, protected, accessed, disclosed, or used the Morenos' private financial and identity documents, and whether any conflict, confidentiality, supervision, or property-management authority issue existed.
Documents Withheld Unless Requested	No unredacted financial records, IDs, bank records, City records, or litigation exhibits concerning Mayor Kennon are included in this initial packet. Additional redacted or unredacted materials can be provided upon AREC request through secure/confidential instructions as appropriate.